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July 11, 2023

Honorable Julien X. Neals United States District Judge Martin Luther King, Jr. Federal Building and United States Courthouse 50 Walnut Street Newark, New Jersey 07102 Attn: Kimberly Darling, Courtroom Deputy

RE: **UNITED STATES v. JOSE MINAYA** 

DOCKET NO.: 23-00008-001

Dear Judge Neals:

As the Court record reflects, the undersigned represents the above captioned defendant the Government is represented by Shawn Barnes, Assistant U.S. Attorney, and the U.S. Probation Department is represented by Adriana Garcia O'Hara, Senior U.S. Probation Officer, on this case.

This letter is to respectfully request a two-week continuance in the defendant's current sentencing date of July 31, 2023, at 2:00 p.m. before Your Honor.

My request is made with the consent of Counsel Barnes, and Senior Probation Officer O'Hara. The request is made necessary, to give the undersigned, on behalf of the defendant, to have a full and complete opportunity to review, comment, and consider, the Presentence Investigation Report of Officer O'Hara, on the defendant, with the Government's observations and comments.

The request has been made necessary due to my trial/motion and deposition schedule over the last 60 days, with the Presentence Investigation Report, being filed on June 20,2023, by Senior Officer O'Hara.

This continuance request will allow me to have until, July 20, 2023, to circulate the defendants' observations and comments on the Probation Department's Presentence Report and give all sides sufficient time, thereafter, to prepare and file timely Sentencing Memorandum's, to Your Honor, in this matter.

For the good faith basis, with consent of all parties, it is respectfully requested, that the Court grant the defendants request to postpone sentencing, for a period of two weeks, in harmony with Your Honors calendar/schedule.

Thanking the Court for its understanding, patience, and courtesies, in this matter

Respectfully submitted,

RICHARD S. MAZAWEY, ESQ

RSM/bb

Cc: Shawn P, Barnes, AUSA (via email to: <u>Shawn.Barnes@usdoj.gov</u>)
Adrianna O'Hara, (via email to: adriana O'Hara@njp.uscourts.gov)